

## DISTRICT OF MASSACHUSETTS

[illegible]

Case No. 1:25-cv-11042-MJJ

$$\left. \begin{array}{l} \text{ )} \\ \text{ )} \end{array} \right\}$$
$$\begin{pmatrix} ) \\ ) \\ ) \\ ) \\ ) \\ ) \\ ) \end{pmatrix}$$

)

## DECLARATION OF PATRICK ARCHER

I, Patrick Archer, hereby declare and state as follows:

1. I am a law fellow at Public Justice, a nonprofit legal advocacy organization that represents the Plaintiffs in this case. I submit this declaration in support of the Plaintiffs' Motion for a Preliminary Injunction. The following is true of my own personal knowledge, and, if called as a witness, I would and could testify competently thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of the declaration of Catherine Lhamon that was filed in *New York v. McMahon*, No. 1:25-cv-10601 (D. Mass. Mar. 24, 2025) (“*New York*”), ECF No. 71-48.

3. Attached hereto as Exhibit 2 is a true and correct copy of the declaration of Doe 1 that was filed in *New York*, ECF No. 71-53.

4. Attached hereto as Exhibit 3 is a true and correct copy of the declaration of Terri Gonzales that was filed in *New York*, ECF No. 71-47.

5. Attached hereto as Exhibit 4 is a true and correct copy of the declaration of Doe 7 that was filed in *New York*, ECF No. 71-59.

6. Attached hereto as Exhibit 5 is a true and correct copy of a statement delivered by Secretary of Education Linda McMahon on March 3, 2025, entitled “Our Department’s Final Mission.” It is accessible on the Department of Education’s website at: <https://www.ed.gov/about/news/speech/secretary-mcmahon-our-departments-final-mission> (last accessed May 1, 2025).

7. Attached hereto as Exhibit 6 is a true and correct copy of a press release issued by the Department of Education on March 11, 2025, entitled “U.S. Department of Education Initiates Reduction in Force.” The press release is accessible on the Department of Education’s website at: <https://bit.ly/42fXyf8> (last accessed May 1, 2025).

8. Attached hereto as Exhibit 7 is a true and correct copy of the declaration of Sheria Smith that was filed in *New York*, ECF No. 71-49.

9. Attached hereto as Exhibit 8 is a true and correct copy of a memorandum issued by Acting Assistant Secretary for Civil Rights Craig Trainor on February 20, 2025, entitled “Revised Case Processing Manual/Disability Discrimination Complaints.”

10. Attached hereto as Exhibit 9 is a true and correct copy of the declaration of Doe 3 that was filed in *New York*, ECF No. 71-55.

11. Attached hereto as Exhibit 10 is a true and correct copy of the supplemental declaration of Shayla Hamlin that was filed in *New York*, ECF No. 102-14.

12. Attached hereto as Exhibit 11 is a true and correct copy of a report issued by the Department of Education entitled “Protecting Civil Rights: Highlights of Activities, Office of Civil

Rights 2021-2025.” The report is accessible at: <https://www.ed.gov/media/document/protecting-civil-rights-109409.pdf> (last accessed May 1, 2025).

13. Attached hereto as Exhibit 12 is a report filed by the Department of Education’s Office of Civil Rights entitled “2024 Fiscal Year Annual Report.” The report is accessible at: <https://www.ed.gov/media/document/ocr-report-president-and-secretary-of-education-2024-109012.pdf> (last accessed May 1, 2025).

14. Attached hereto as Exhibit 13 are excerpts from the Department of Education’s Office of Civil Rights’ annual budget requests for fiscal years 2010-2025. The budget request for fiscal year 2025 is available at: <https://www.ed.gov/sites/ed/files/about/overview/budget/budget25/justifications/dd-ocr.pdf> (last accessed May 2, 2025). The full budget requests for fiscal years 2020-2024 are accessible through the Department of Education’s website at: <https://www.ed.gov/about/ed-overview/annual-performance-reports/budget/budget-requests> (last accessed May 2, 2025). The budget requests for fiscal years 2010-2019 are available at: <https://www.ed.gov/about/ed-offices/ocr/fiscal-year-budget-requests> (last accessed May 2, 2025).

15. Attached hereto as Exhibit 14 is a true and correct copy of the declaration of Craig Haller.

16. Attached hereto as Exhibit 15 is a true and correct copy of the declaration of Tara Blunt, a Plaintiff in this action.

17. Attached hereto as Exhibit 16 is a true and correct copy of the declaration of Karen Josefosky, a Plaintiff in this action.

18. Attached hereto as Exhibit 17 is a true and correct copy of the declaration of Stacy Malone, the executive director of Victim Rights Law Center, a Plaintiff in this action.


19. Attached hereto as Exhibit 18 is a true and correct copy of the declaration of Dr. Rubén Carmona that was filed in *Somerville Public Schools v. Trump*, No. 1:25-cv-10677 (D. Mass. Apr. 1, 2025), ECF No. 27-7.

20. Attached hereto as Exhibit 19 is a true and correct copy of the declaration of Kathleen Ehling that was filed in *New York*, ECF No. 71-21.

21. Attached hereto as Exhibit 20 is a true and correct copy of the declaration of Drew Echelson that was filed in *New York*, ECF No. 71-36.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 2nd day of May, 2025.

  
\_\_\_\_\_  
Patrick Archer